

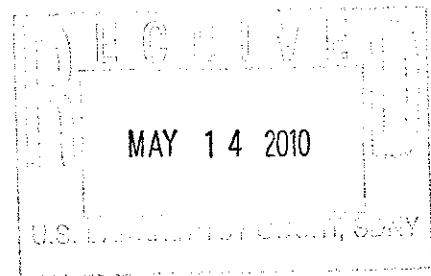
US Bankruptcy Court Southern District  
of New York

In re: Motors Liquidation Co.  
FKA General Motors Corp.  
debtors.

09-50026

Lisa Gross

Movant.



Objection to order denying  
motions of Lisa Gross for leave to file  
claim and for relief from automatic stay

According to the Chapter 11 bankruptcy code,  
I object to the order to deny my ~~claim~~  
motions filed March 2 2010 (as above stated).  
For the following:

1. Notice of the claim was given ~~to~~ 6/19/2009.  
docket # 2268 regarding case # 08-3236 in the 10th circuit.
2. No response had been made regarding My  
objection to the stay by the debtors or the court  
filed 6/19/2009 (and the language that would dissolve my  
claims in the 10th circuit)
3. The stay imposed on the 10th circuit case  
# 08-3236 caused all proceedings to cease in  
that jurisdiction therefore no monetary claim  
could legally be submitted even though the ~~motion~~ <sup>objection</sup>

Filed as considered notice.

There fore I object to an order that would deny my requests made March 2 2010 due to the fact that the stay imposed was objected to and no response regarding the ~~stay~~ objection to the stay was addressed by the debtors or the court prior to any deadlines set to file a claim because the court received notice of the claim.

It would prejudice me as a claimant to deny my motions being that I fulfilled the requirements of the court prior to any deadline set by the court to file a claim.

Nor have I received any other documentation regarding any other requirements of the court other than the notice of the Chapter 11 bankruptcy filing commenced on 6/1/2009 Case # 09-50026 which included information to file an objection to the 363 sale by the 6/19/2009 deadline at which I did meet the deadline.

Due to extenuating circumstances no monetary claim could be submitted by me because of mailing ~~errors~~ and the fact that it would be fraudulent to file a monetary claim with no monetary order and the stay imposed that was not responded to. I hereby submit a counter proposed order to grant the motions I filed on March 2 2010 regarding 09-50026 and object to them being denied.

I respectfully request the court due to my financial status to give notification of this objection and my proposed counter order to all opposing parties upon receipt of these documents which are mailed together.

Respectfully & Sincerely Lisa P. Gross



6466 NW 43rd Terrace #201  
Kansas City Mo. 64117 / 816-756-4660  
lisagross5@aol.com 5/13/2010

Please forward to all opposing parties  
via electronic notification all attorneys for debtors  
and debtors in possession.

US Bankruptcy Court Southern District of New York

In re:  
Motors Liquidation Co.,  
FKA General Motors Corp.,  
debtors.

09-50026

Lisa Gross  
Movant

ORDER GRANTING MOTIONS OF LISA GROSS  
FOR LEAVE TO FILE CLAIM AND FOR RELIEF  
FROM AUTOMATIC STAY

On June 19 2009 Mrs. Gross filed a timely objection to the 363 sale ~~and~~ any language that would dissolve her claims in the 10<sup>th</sup> Circuit Court of appeals which also included her objection to the automatic stay imposed on the same case according to the rules set forth in the Chapter 11 bankruptcy code.

Due to unforeseen circumstances Mrs. Gross did not attend the April 29, 2010 Conference as she so desired to do so. However the cause for a conference appears pointless since her request is not untimely and she has met the requirements of the court and the law prior to any deadlines set regarding claims by giving notice of the claim in her objection filed 6/19/2009 docket # 2248

Because there is no order for a monetary amount in the tenth circuit due to the automatic stay. The right to file a monetary claim pending post an order in the 10<sup>th</sup> circuit court of appeals <sup>or another court with jurisdiction</sup> regarding case # 08-3236 should be and therefore is reserved for her to file at a later date. Mrs. Gross also reserves the right to amend her claim filed 6/19/2009, due to extenuating circumstances set forth in her requests filed March 2 2010. And the debtors gross negligence to respond to the objection and to adequately notify her of timelines set forth by the court to file a claim.

Mrs. Gross cannot at this time ~~can~~ by law submit any monetary claim and even by or before the deadline set forth by the court to file a claim because of the stay imposed on the claim in the 10<sup>th</sup> circuit case # 08-3236

To file a monetary claim with no monetary order constitutes fraud and according to the claim form supplied by the claims agent that can be downloaded from the internet and used to file claims according to these proceedings in this court, filing a fraudulent claim is punishable by ~~the~~ federal law by imprisonment or a fine of up to \$500,000.00.

The debtors have failed to file a response to Mrs. Gross's objection to the automatic stay and the language that would dissolve her claims filed 6/19/2009 an objection based upon the chapter 11 bankruptcy code. Her request made March 2, 2010 does not prejudice the debtors in any way due to the fact notice of her claim was given 6/19/2009 as also was her objection to the stay.

Footnote: Changes on this page line 4 stipulates any other court with jurisdiction regarding Mrs. Gross's claims in the 10<sup>th</sup> circuit court of Appeals.

Therefore the court must enter a judgement in favor of movant (Lisa Gross) and grant her request for relief from the automatic stay and also grant her request to not just file a claim being there is a claim filed but to amend her claim after a monetary order is issued by the Tenth Circuit regarding case # 08-3236.

Granted because the automatic stay imposed on her claims in the tenth circuit does not apply to a title claim

Granted Lisa Gross's motion to file claim pending an order from the tenth circuit court and or any other courts that would have jurisdiction concerning her claims in the 10<sup>th</sup> circuit

Granted Lisa Gross's motion for relief from the automatic stay so the tenth circuit court may issue an order that she may be able to legally and lawfully file her amended claim that would include a monetary amount regarding case 09-50026 in the bankruptcy court.

Granted according to the chapter 11 bankruptcy code and all statutes and codes set forth therein,

Granted because Mrs. Gross has met the requirements of this court and the law. It is further granted with the debtors right to appeal revoked because of the gross negligence and failure to respond to docket # 2248 where Mrs. Gross filed her objections and her claim. The debtors have forfeited their right to appeal because the debtors are without excuse.

Granted because it would be unfair, unjust and unrighteous and would prejudice movant to deny her request for any reasons set forth by the debtors. It is the debtors responsibility to adequately respond to any and all claims motions, pleadings and objections of which they have failed to do so regarding Mrs. Gross.

This order is with prejudice to the debtors.  
 The right ~~to~~ appeal due to their gross negligence and  
 failure to respond to Mrs. Gross's objection to the  
 automatic stay and notification of her claims and objection  
 to language that would dissolve her claims via the  
 tenth circuit filed 6/19/2009 and any other court with jurisdiction  
 regarding case #08-323.  
 Therefore this matter is decided factually, legally  
 and righteously with the rights of the debtors to appeal  
 in this or any other court revoked.

The debtors are clearly aware of the timelines set forth  
 to file responses to any and all objections, claims, motions  
 and pleadings and have failed to do so even within  
 reason regarding Mrs. Gross's objection filed 6/19/2009.

It is also ordered this court will no longer entertain  
 any further opposition to Mrs. Gross requests for relief  
 from the automatic stay and for leave to file a claim.

Dated: New York, New York

May — 2010

The honorable Robert E Gerber,  
 United States bankruptcy  
 judge.

Foot note: link to stipulations any other court with jurisdiction  
 regarding case #08-3236